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Attorneys for Plaintiffs and the Class

UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA

BUCKEYE TREE LODGE AND SEQUOIA
VILLAGE INN, LLC, a California limited
liability company, 2020 O STREET
CORPORATION, INC, D/B/A THE MANSION
ON O STREET, PROSPECT HISTORIC
HOTEL, and SHILOH MORNING INN, LLC, a
Oklahoma limited liability company,
individually and on behalf of themselves and all
others similarly situated,

Plaintiffs,

vs.

EXPEDIA, INC., a Washington corporation;
HOTELS.COM, L.P., a Texas limited
partnership; HOTELS.COM GP, LLC, a Texas
limited liability company; ORBITZ, LLC, a
Delaware limited liability company,

Defendants.

Case No. 3:16-cv-04721-VC

CLASS ACTION

**DECLARATION OF TED SPERO IN SUPPORT
OF PLAINTIFFS' UNOPPOSED MOTION FOR
APPROVAL OF CLASS ACTION
SETTLEMENT, ATTORNEY'S FEES AND
COSTS, AND INCENTIVE AWARDS**

Date: March 25, 2021
Time: 2:00 p.m.
Courtroom: 4, 17th Floor
Judge: Hon. Vince Chhabria

1 I, Ted Spero, declare as follows:

2 1. I am the President of Plaintiff The Mansion on O Street. I make this declaration in support
3 of Plaintiffs' Unopposed Motion for Approval of Class Action Settlement. If called as a witness, I would
4 and could testify to the following:

5 2. The Mansion on O Street is located in Washington, D.C.

6 3. As a Class Representative, I have been very involved in my case against Expedia. I
7 assisted Class Counsel's investigation by discussing my experiences with Expedia's false advertisements
8 about The Mansion's availability, as well as my perception and understanding of the effect of those
9 advertisements on my business and my customers.

10 4. Since I became involved with this action, I regularly spoke with my counsel to stay
11 informed of the status of my case and to discuss the next steps.

12 5. I worked with Class Counsel on my discovery requests. I looked for documents and
13 provided them to Class Counsel.

14 6. I met with Class Counsel to prepare for my deposition, which I attended on February 15,
15 2018. I faced questioning about The Mansion's availability, my experiences with Expedia and similar
16 websites, and the false unavailability messages about The Mansion that appeared on Expedia's websites.

17 7. I communicated with Class Counsel regarding settlement throughout the litigation and in
18 connection with the two mediations and the settlement conference. I have always had the best interests of
19 the Class in mind when considering whether to resolve this action. Since I knew it was important to
20 fulfill my obligation to Class Members, I evaluated the benefits of the settlement—the injunction that
21 will stop Expedia from making false statements about Class Members' availability—to make sure the
22 settlement was fair to the Class Members I represent.

23 8. I reviewed and submitted declarations in support of class certification and in support of
24 settlement approval.

25 9. I have devoted substantial time to litigate this action to seek a change in Expedia's
26 advertising practices. I believe that my dedication and effort have conferred a significant benefit on other
27 Class Members and on consumers.

1 I declare under penalty of perjury under the law of the State of California that the foregoing is
2 true and correct. Executed on February 24, 2021 in Washington, D.C.

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